

- b. Emissions of VOM from the cleanup operations shall not exceed the following limits:

VOM Usage		VOM Emissions	
<u>(Lb/Day)</u>	<u>(Tons/Year)</u>	<u>(Lb/Day)</u>	<u>(Tons/Year)</u>
400	2	15	2

These limits are based on the maximum values agreed to in the 1999 application. The emission limits are based on a minimum reduction in VOM of 95% by the afterburner (excluding VOM emissions from clean-up operation).

- c. This permit does not allow the operation of the cloth treater unit when processing coatings and resins containing VOM or HAPs and the existing two cone coating/drying ovens simultaneously at any given time. The Permittee shall only operate either the cloth treater unit when processing coatings and resins containing VOM or HAPs or the two cone coating/drying ovens at any given time.
 - d. In the event that the operation of this emission unit results in an odor nuisance, the Permittee shall take appropriate and necessary actions to minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the odor nuisance.
 - e. This permit is issued based on approximately 100% of the VOM emissions from the two cone coating, drying ovens (excluding VOM emissions from clean-up operations) and cloth treater being captured and ducted to the afterburner.
 - f. Compliance with the above limits shall be determined from the recordkeeping requirement of Condition 6. Compliance with annual limits shall be determined using a rolling total of 365 days of data. Compliance with the rolling annual limits for each day of the 365 day period immediately following the issuance date of this permit shall be determined using available data from the previous year.
4. The emissions of Hazardous Air Pollutants (HAP) as listed in Section 112(b) of the Clean Air Act shall be less than 10 tons/year of any single HAP and 25 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of all HAPs from this source not triggering the requirements to obtain a Clean Air Act Permit Program Permit (CAAPP), and Section 112(G) of the Clean Air Act.
- a. Emissions of hazardous air pollutants (HAPs), as specified in Appendix A of the Clean Air Act, shall not exceed the following limits:

<u>Item</u>	<u>HAPs Emissions</u>	
	<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
Any Individual HAP	2	6
All HAPs (Combined)	2	12

This general HAP emission limit is to restrict the source below major source HAP levels and provide operational flexibility.

- b. Compliance with the above limits shall be determined from the recordkeeping requirement of Condition 6.
- 5a. The afterburner shall be in operation at all times the cone coating is being performed. Notwithstanding 35 Ill. Adm. Code 218.107, winter shutdown of the afterburner is not permitted.
- b. The afterburner shall be in operation at all times when the cloth treater unit is processing coatings and resins containing VOM or hazardous air pollutants (HAPs) an demitting regulated air contaminants. When the cloth treater unit is processing non-VOM/HAP or non-regulated coatings, the exhaust gases will not be required to be processed through the afterburner.
 - c. The afterburner shall be operated in accordance with the requirements of 35 Ill. Adm. Code 218.105(d) (2) .
 - d. The afterburner combustion chamber shall be preheated to a minimum temperature of 1500°F before the coating process is begun. At least this temperature shall be maintained during operation.
 - e. The afterburner shall be equipped with a continuous temperature indicator and strip chart recorder or disk storage for the combustion chamber temperature.
- 6a. Pursuant to 35 Ill. Adm. Code 218.211(e), the Permittee shall collect and record all of the following information each day and maintain this information at the source for a period of three years from the date of record.
- i. Control device monitoring data.
 - ii. A log of operating time for the capture system, control device and monitoring equipment and the associated equipment.
 - iii. A maintenance log for the capture system, control device and monitoring equipment detailing all routine and non-routine maintenance performed including dates and duration of any outages.
- b. The Permittee shall collect and maintain record of the following information:

- i. Name and identification of each coating used each day for each coating line.
 - ii. Coating usage in lbs/day and tons/year.
 - iii. Density of each coating used (lbs/gallon).
 - iv. The weight of VOM per volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day for each coating line.
 - v. The daily-weighted average VOM content of all coatings as applied.
 - vi. VOM emissions from the coating, drying operation and cloth treating in lbs/day. This shall be calculated using the coating usage, VOM content and the destruction efficiency of the afterburner (destruction efficiency is the combination of capture and control). Annual VOM emissions, summing the days VOM emission and the previous 364 days.
 - vii. Name and identification of all clean-up solvents used and usage rate in lbs/month.
 - viii. Density of clean-up solvent.
 - ix. VOM content of clean-up solvent in weight percent.
 - x. Amount of clean-up solvent reclaimed for reuse or sent offsite for disposal.
 - xi. Monthly VOM emissions from clean-up operations (lbs/month). This shall be calculated using the total usage per month, VOM content of the material and amount of material reclaimed for reuse or sent offsite for disposal. Annual VOM emission from clean-up operation shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months.
 - xii. Monthly records of Hazardous Air Pollutant content of all coatings and cleaning solutions.
 - xiii. Monthly HAP emissions from use of all coatings, and cleaning solutions. Annual HAP emissions shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months.
7. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA request for records during the course of a source inspection.

8. The Permittee shall, in accordance with the manufacturer(s) and/or vendor(s) recommendations, perform periodic maintenance on the air pollution control equipment covered under this permit such that the air pollution control equipment be kept in proper working condition and not cause a violation of the Illinois Environmental Protection Act or regulations promulgated therein.
9. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.
10. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Compliance Section (#40)
P.O. Box 19276
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency
Division of Air Pollution Control
9511 West Harrison
Des Plaines, Illinois 60016

If you have any questions on this, please call George Kennedy at 217/782-2113.

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

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cc: Region 1
Lotus Notes

Attachment A - Emissions Summary

This attachment provides a summary of the maximum emissions from the coating plant operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. The resulting maximum emissions are below the levels, e.g., 25 tons per year of VOM at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled and control measures are more effective than required in this permit.

<u>Emission Unit</u>	<u>VOM</u>	<u>E M I S S I O N S (tons/year)</u>		<u>NO_x</u>
		<u>Individual HAP</u>	<u>Combination HAPs</u>	
Coating, Drying Ovens and Cloth Treater	20.0			
Cleanup	2.0			
Afterburner				0.7
Total This Source	24.0	6	12	0.7

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PROJECT SUMMARY

I. INTRODUCTION

NuWay Speaker Products, Inc. has voluntarily applied for a renewal of its operating permit for its Antioch coating facility in order to voluntarily incorporate federally enforceable limits. These limits would prevent the facility from being a major source of emissions so that an operating permit does not have to be obtained under the Clean Air Act Permit Program. The proposed limits would be accompanied by recordkeeping and reporting requirements to assure that the facility is operated as a non-major source.

II. SOURCE DESCRIPTION

NuWay Speaker Products, Inc. operates two cone coating and drying ovens controlled by an afterburner and a cloth treater also controlled by the same afterburner. The coating operation involves cone coating (cones are speaker components). The cones are dipped coated in coaters and dried in attached drying ovens which are electrically heated. The cloth treating operation involves the cloth being fed through a dip tank then on to a drying station. The volatile organic material (VOM) emissions from these operations are ducted to the afterburner. The proposed permit also includes limitations on clean up solvent usage and emissions.

III. EMISSIONS

The principal air contaminant emitted from the facility is volatile organic material (VOM) which is generated during coating handling/usage throughout the coating, cloth treating, and drying process. The VOMs released during the application and drying of the coating is controlled by the afterburner. VOMs from cleaning are released uncontrolled and emitted to the atmosphere.

IV. APPLICABLE EMISSION STANDARDS

All emission sources in Illinois must comply with the Illinois Pollution Control Board emission standards at 35 Ill. Adm. Code, Subtitle B. The Board has standards for sources of volatile organic material emissions. This site readily complies with all applicable Board standards.

V. PROPOSED PERMIT

The conditions of the proposed permit contain limitations and requirements to assure that this facility will be operated as a non-major source. The permit sets limitations on usage of raw materials and paint production rate. These limitations are consistent with the historical operation and capacity of the facility.

The permit conditions also establish appropriate compliance procedures, including inspection practices, recordkeeping requirements, and reporting requirements. The Permittee must carry out these procedures on an on-going basis to demonstrate that the facility is operating within the limitations set by the permit and are properly controlling emissions.

VI. REQUEST FOR COMMENTS

It is the Illinois EPA's preliminary determination that the facility meets all applicable state and federal air pollution control requirements, subject to the conditions proposed in the draft permit. The Illinois EPA is therefore proposing to issue a permit with federally enforceable limits for this operation.

Comments are requested on this proposed action by the Illinois EPA and the proposed conditions on the draft permit. If substantial public interest is shown in this matter, the Illinois EPA will consider holding a public hearing in accordance with 35 Ill. Adm. Code Part 166.

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